

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**TIMOTHY FERGUSON**, an individual,

Plaintiff,

v.

**COOK COUNTY, ILLINOIS**, a municipal corporation, **CITY OF CHICAGO**, a municipal corporation, **RICHARD BEDNAREK**, an individual and as an employee of the Chicago Police Department and an employee of D-BATS, Inc., **JOHN D. BARLOGA**, an individual and as an employee of the Cook County Sheriff, **ABELARDO MERCADO**, an individual and as an employee of the Cook County Sheriff, **EDDIE ISHOO**, an individual and as an employee of the Cook County Sheriff, and **D-BATS Inc.**, an Illinois corporation.

Defendants.

Case No. 1:20-cv-04046

Honorable Robert M. Dow, Jr

Magistrate Gabriel A. Fuentes

**DEFENDANTS' JOINT UNOPPOSED MOTION FOR EXTENSION  
OF TIME TO ANSWER DISCOVERY**

Now comes Defendants, COOK COUNTY, CITY OF CHICAGO, ABELARDO MERCADO, EDDIE ISHOO and JOHN D. BARLOGA, by and through undersigned counsel, and hereby move this Honorable Court for an Order extending the time for within-moving Defendants to respond Plaintiff's written discovery from April 29, 2022, to May 16, 2022. For the reasons more fully set forth below, this request is made with good cause.

1. Plaintiff issued his written interrogatories to Defendants on March 22, 2022, and then requests to produce on March 23, 2022.

2. Defendants' current deadline, as set by this Court, to respond to Plaintiff's written discovery is April 29, 2022. (Dckt. 101).

3. Defendants need additional time to file a Confidential Protective Order, in order to produce certain sensitive documents.

4. Additionally, Defendants must seek the cooperation of numerous individuals in order to properly respond to Plaintiff's discovery.

5. Defendants requested the additional time to respond, and Plaintiff agreed to extend the deadline to answer to May 16, 2022. Plaintiff agreed to this request by email. Consequently, no prejudice will be experienced by the parties if this Honorable Court grants the relief requested herein.

**WHEREFORE**, Defendants, COOK COUNTY, CITY OF CHICAGO, ABELARDO MERCADO, EDDIE ISHOO and JOHN D. BARLOGA, by and through undersigned counsel, hereby move this Honorable Court for an Order extending the deadline to respond to respond Plaintiff's written discovery until May 16, 2022, and for any additional relief that this Court deems necessary and just.

Respectfully Submitted,

By: /s/ John C. Coyne

Attorney for Cook County, Sgt. John  
Bargola, And Abelardo Mercado &  
Eddie Ishoo

By: /s/ Danielle A. Clayton

Attorney for City of Chicago

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**CERTIFICATE OF SERVICE**

I, Patricia Andersen, certify that I filed and served this documents upon all counsel of record via the Courts Electronic filing system this 29<sup>th</sup> day of April 2022.

/s/ Patricia A. Andersen